

**AUTHORIZATION TO RELEASE
EMPLOYMENT AND/OR APPLICATION RECORDS**

TO ALL EMPLOYERS AND POTENTIAL EMPLOYERS OF JUANA CRUZ:

You are hereby authorized to furnish and release to Ogletree, Deakins, Nash, Smoak & Stewart, P.C. and/or Porter Hedges LLP, and their staff members, representatives and employees, any and all information and documents in your possession or control concerning the employment or potential employment of the above-referenced individual for use in Civil Action No. 7:23-CV-00343, styled "*Juana Cruz, et al. v. Delgar Foods, LLC dba Delia's*" pending in the United States District Court, Southern District of Texas, McAllen Division.

You are hereby authorized and requested to copy and produce any and all:

1. Employment applications;
2. Resumes;
3. Payroll records (including but not limited to pay stubs and pay advices);
4. Hour or time records;
5. Schedules;
6. Records of absences; and
7. Records of any periods of leave.

The relevant period for records responsive/covered by this authorization is 2020–2023.

A copy of this authorization should be considered as valid as the original and shall remain in effect so long as the above-mentioned case is pending.

DATED this 9th day of April, 2024.


JUANA CRUZ

EXHIBIT

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First Set of Request for Admissions

Admission 1. Defendant paid you at least minimum wage for all hours worked by you during your employment.

Response: Deny

Admission 2. Defendant paid you at least minimum wage for all hours worked by you from 2020-2023.

Response: Admit

Admission 3. Defendant paid you time-and-a-half for all hours worked over 40 in a workweek by you during your employment.

Response: Deny

Admission 4. Defendant paid you time-and-a-half for all hours worked over 40 in a workweek by you from 2020-2023.

Response: Deny

Admission 5. Defendant correctly paid you for all hours worked during your employment.

Response: Deny

Admission 6. Defendant correctly paid you for all hours worked by you from 2020-2023.

Response: Admit

Admission 7. Defendant paid you for all hours worked by you from 2020-2023.

Response: Deny

Admission 8. You reported all hours worked by you accurately to Defendant.

Response: Deny

Admission 9. You recorded all hours worked by you for Defendant in Defendant's timekeeping system.

Response: Admit

Admission 10. You have no written documentation to rebut Defendant's time records of hours worked by you.

Response: Admit

Admission 11. While employed by Defendant, you were aware of Defendant's requirement to accurately record your hours worked.

Response: Deny

Admission 12. You at all times complied with Defendant's requirement to accurately record hours worked by you.

Response: Admit

Admission 13. You at all times complied with Defendant's requirement to accurately report hours worked by you.

Response: Admit

Admission 14. You reviewed your pay to confirm its accuracy on a weekly basis from 2020-2023.

Response: Admit

Admission 15. You reviewed your hours worked to confirm their accuracy on a weekly basis from 2020-2023.

Response: Admit

Admission 16. Defendant paid you overtime wages from 2020-2023.

Response: Admit

Admission 17. Any error made by Defendant as to your hours worked was unintentional.

Response: Deny

Admission 18. Any error made by Defendant as to your hours worked was not done willfully.

Response: Deny

Admission 19. Any error made by Defendant as to your hours worked was not done knowingly.

Response: Deny

Admission 20. Any error made by Defendant as to your pay was unintentional.

Response: Deny

Admission 21. Any error made by Defendant as to your pay was not done willfully.

Response: Deny

Admission 22. Any error made by Defendant as to your pay was not done knowingly.

Response: Deny

Admission 23. You received no cash for wages from Defendant from 2020-2023.

Response: Admit

Admission 24. You have no written documentation of hours worked by you for Defendant.

Response: Admit

Admission 25. You have never spoken to Delia Garza a/k/a/ Delia Lubin from 2020-2023.

Response: Deny

Admission 26. You have never seen Delia Garza a/k/a/ Delia Lubin from 2020-2023.

Response: Deny

Admission 27. You have never spoken to Delia Garza a/k/a/ Delia Lubin from 2020-2023 regarding your pay.

Response: Deny

Admission 28. You have never spoken to Delia Garza a/k/a/ Delia Lubin from 2020-2023 regarding hours worked.

Response: Deny

Admission 29. You have never spoken to Sofia Lubin from 2020-2023.

Response: Deny

Admission 30. You have never spoken to Sofia Lubin from 2020-2023 regarding your pay.

Response: Deny

Admission 31. You have never spoken to Sofia Lubin from 2020-2023 regarding hours worked.

Response: Deny

Admission 32. You have never spoken to Blanca Sierra from 2020-2023 regarding your pay.

Response: Deny

Admission 33. You have never spoken to Blanca Sierra from 2020-2023 regarding hours worked.

Response: Deny

Admission 34. You have never spoken to Letty Zumaya from 2020-2023 regarding your pay.

Response: Deny

Admission 35. You have never spoken to Letty Zumaya from 2020-2023 regarding hours worked.

Response: Deny

Admission 36. You have never spoken to El Guero Garza from 2020-2023 regarding your pay.

Response: Admit

Admission 37. You have never spoken to El Guero Garza from 2020-2023 regarding hours worked.

Response: Admit

Admission 38. You have never spoken to Benito Garza from 2020-2023 regarding your pay.

Response: Admit

Admission 39. You have never spoken to Benito Garza from 2020-2023 regarding hours worked.

Response: Admit

Admission 40. You have never spoken to Alberto Trevino from 2020-2023 regarding your pay.

Response: Deny

Admission 41. You have never spoken to Alberto Trevino from 2020-2023 regarding hours worked.

Response: Deny

Admission 42. You have never spoken to Mirta Garza from 2020-2023 regarding your pay.

Response: Admit

Admission 43. You have never spoken to Mirta Garza from 2020-2023 regarding hours worked.

Response: Admit

Admission 44. You have never spoken to Lorenzo Luben from 2020-2023 regarding your pay.

Response: Admit

Admission 45. You have never spoken to Lorenzo Luben from 2020-2023 regarding hours worked.

Response: Admit

Admission 46. You did not work for Defendant from 2020-2023.

Response: Deny